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## Remarks

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Applicants appreciate the withdrawal of the restriction requirement of claims 18-23 and 27-30.

Applicants hereby add new claims 31-38. Accordingly, claims 1-7, 13-23, and 25-38 are pending in the present application.

Claims 1, 7 and 27 are objected to. Claims 27-30 stand rejected under 35 USC §101 as being directed to non-statutory subject matter. Claims 1, 3-5, 7, 13, 16, 18-19, 23 and 27-28 stand rejected under 35 USC 102(b) for anticipation by U.S. Patent No. 5,933,184 to Ishigami et al. Claims 2, 6, 14-15, 21-22 and 30 stand rejected under 35 USC 103(a) for obviousness over Ishigami. Claims 17, 20 and 29 stand rejected under 35 USC 103(a) for obviousness over Ishigami in view of "A 3-D vision system model for automatic object surface sensing" to Theodoracatos.

Applicants respectfully request reconsideration of the rejections.

Applicants submit a new title herewith and Applicants respectfully request approval of the title.

Applicants submit a new abstract herewith and submit the abstract is in full compliance with the MPEP. Applicants respectfully request approval of the abstract.

Referring to the claim objections, Applicants have amended claims 1, 7 and 27. Applicants respectfully request withdrawal of the objections to claims 1, 7 and 27.

Referring to the 101 rejection, claim 27 has been amended to recite computer-readable media as suggested by the Office. Applicants respectfully submit the claims 27-30 are statutory and request withdrawal of the 101 rejection.

Referring to independent claim 1, the method recites a hard imaging method comprising accessing image data corresponding to a hard image to be formed and modifying the image data using correction data. The Office at page 5 recites various teachings of Ishigami as allegedly teaching various limitations of the claims. The Office recites col. 2, lines 58-67, col. 3, lines 1-16, and col. 4, lines 30-66 as allegedly teaching the claimed modifying. Applicants respectfully submit Ishigami

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fails to teach or suggest modification of image data and the rejection is improper for at least this reason.

In particular, at col. 4, lines 52+ of Ishigami, it is disclosed that the storage unit holds data which corrects distortion in the scanning direction. It is further disclosed that that a chain of clock pulses for image signal creation is generated corresponding to the correction data. *Ishigami discloses variation of clock pulses according to the correction data*. In particular, Ishigami discloses that three types of clock pulses are generated corresponding to the correction data including a clock pulse with a reference period, a clock pulse with a period shorter than a reference period and a clock pulse with a period longer than the reference period. Applicants respectfully submit that modification of the clock pulses fails to teach or suggest modification of the print data of Ishigami and Ishigami fails to teach or suggest modifying image data using correction data as positively claimed.

Applicants respectfully submit that positively recited limitations of claim 1 are not disclosed nor suggested by Ishigami and the anticipation rejection is improper for at least this reason.

The claims which depend from claim 1 are in condition for allowance for the reasons discussed above with respect to the independent claim as well as for their own respective features which are neither shown nor suggested by the cited art.

For example, claim 2 now recites rasterizing the image data and wherein the modifying comprises <u>modifying the image data being rasterized</u> during the rasterizing. To the contrary of claim 2, Ishlgami discloses modification of clock pulses according to the correction data and fails to teach or suggest the explicitly claimed method of using correction data to modify the image data being rasterized during the rasterizing. In addition, Applicants have electronically searched Ishlgami and failed to locate any mention of "raster" let alone the claimed modifying the image data being rasterized during the rasterizing. Applicants also respectfully submit that Ishlgami provides a specific disclosure of modification of clock pulses and fails to suggest modification of image data being rasterized using the correction data. Further, there is no proper rationale for combining the teachings of Chase with the teachings of Ishlgami, and even if combined, the combination fails to teach or suggest the limitations of modification of image data being rasterized using the correction data.

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Applicants respectfully request withdrawal of the 103 rejection of claim 2 and allowance of claim 2 for at least the above-mentioned compelling reasons.

Referring to dependent claim 6, the method recites *modifying the image data* using a <u>raster image processor</u>. Per paragraph 0035 of the present application, the raster image processor accepts a high-level description of a page to be printed and produces binary raster image data to determine which pixels to turn on and turn off to draw individual scan lines. Ishigami fails to mention raster and teaches modification of clock pulses according to correction data. Applicants have failed to uncover any teachings in Fig. 11a-b or col. 3, lines 59-61 of Ishigami which may be considered to teach a raster image processor or *modifying the image data using correction data using a raster image processor* as explicitly claimed. There is no proper rationale for combing the teachings of Chase with the teachings of Ishigami, and even if combined, the combination fails to teach or suggest the limitations of the modifying using a raster image processor.

Applicants respectfully request withdrawal of the 103 rejection of claim 6 and allowance of claim 6 for at least the above-mentioned compelling reasons.

Referring to independent claim 13, the device comprises processing circuitry configured to access image data corresponding to images to be formed using a hard imaging device and to access correction data. Claim 13 further recites the processing circuitry configured to modify the <u>image data</u> according to the correction data to reduce image errors. The Office relies upon teachings of image clock generating unit 9 of Ishigami as allegedly disclosing the claimed processing circuitry. However, <u>image clock generating unit 9</u> of Ishigami discloses variation of <u>clock pulses</u> according to the correction data and Applicants respectfully submit that modification of the clock pulses fails to teach or suggest modification of the print data of Ishigami and Ishigami fails to teach or suggest the processing circuitry configured to modify the <u>image data</u> according to the correction data as positively claimed.

Applicants respectfully submit that positively recited limitations of claim 13 are not disclosed nor suggested by Ishigami and the anticipation rejection is improper for at least this reason.

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The claims which depend from claim 13 are in condition for allowance for the reasons discussed above with respect to the independent claim as well as for their own respective features which are neither shown nor suggested by the cited art.

For example referring to claim 15, Applicants have failed to uncover any teachings in Ishigami of the claimed <u>raster image processing circuitry</u> configured to modify the image data according to the correction data to convert the image data from an <u>initial format</u> to a <u>raster format</u> as explicitly claimed. Applicants have failed to uncover any structure teachings in Ishigami which may be fairly considered to teach or suggest the claimed raster image processing circuitry configured to convert the image data from an initial format to a raster format as claimed in combination with the limitations of claim 13.

Applicants respectfully request withdrawal of the 103 rejection of claim 15 and allowance of claim 15 for at least the above-mentioned compelling reasons.

Referring to Independent claim 18, Applicants respectfully submit that the image clock generating unit 9 of Ishlgami discloses variation of clock pulses according to the correction data. Applicants respectfully submit that the image clock generating unit 9 and modification of the clock pulses thereby fails to teach or suggest modification of the print data of Ishlgami and Ishlgami fails to teach or suggest the claimed processing circultry configured to modify the image data and the modification comprises modifying the image data to control the generation of light in a manner to reduce the presence of Image errors caused by scanning errors as positively claimed.

Applicants respectfully submit that positively recited limitations of claim 18 are not disclosed nor suggested by Ishigami and the anticipation rejection is improper for at least this reason.

The claims which depend from claim 18 are in condition for allowance for the reasons discussed above with respect to the independent claim as well as for their own respective features which are neither shown nor suggested by the cited art.

Referring to claim 27, the teachings of image clock generating unit 9 of Ishigami modifying the clock pulses fails to disclose or suggest the claimed accessing image data corresponding to an initial image to be hard Imaged, accessing correction data corresponding to image errors introduced by an optical scanning system, and modifying the image data responsive to the correction data to improve

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accuracy of a latent image formed by the optical scanning system responsive to the image data and with respect to the initial image.

Applicants respectfully submit that positively recited limitations of claim 18 are not disclosed nor suggested by Ishigami and the anticipation rejection is improper for at least this reason.

The claims which depend from claim 27 are in condition for allowance for the reasons discussed above with respect to the independent claim as well as for their own respective features which are neither shown nor suggested by the cited art.

Applicants hereby add new claims 31-38 which are supported at least by Figs. 3-5 and the associated teachings of the specification.

Applicants respectfully request allowance of all pending claims.

The Examiner is requested to phone the undersigned if the Examiner believes such would facilitate prosecution of the present application. The undersigned is available for telephone consultation at any time during normal business hours (Pacific Time Zone).

Respectfully submitted, William D. Holland

Βv

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